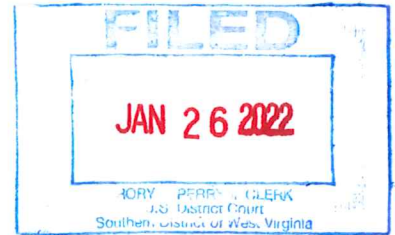


SEALED

UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON GRAND JURY 2021  
JANUARY 25, 2022 SESSION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. 3:22-cr-00023  
18 U.S.C. § 924(a) (1) (A)

WHITNEY KATHLYN HERSHEY

I N D I C T M E N T

The Grand Jury Charges:

COUNT ONE

1. On or about February 14, 2020, at or near Huntington, Cabell County, West Virginia, and within the Southern District of West Virginia, defendant WHITNEY KATHLYN HERSHEY acquired a Glock, Model 27, .40 caliber pistol from Jewelry Gold and Pawn, a licensed dealer in firearms.

2. In connection with the acquisition of the aforesaid firearm, defendant WHITNEY KATHLYN HERSHEY did knowingly make a false and fictitious oral and written statement by certifying that she was the transferee of the firearm, when in fact, as defendant WHITNEY KATHLYN HERSHEY there and then well knew, she was not the true transferee of the firearm.

In violation of Title 18, United States Code, Section 924(a) (1) (A).

COUNT TWO

1. On or about April 13, 2020, at or near Huntington, Cabell County, West Virginia, and within the Southern District of West Virginia, defendant WHITNEY KATHLYN HERSHEY acquired a Ruger AR556 .300 pistol from Freedom Gun and Pawn, a licensed dealer in firearms.

2. In connection with the acquisition of the aforesaid firearm, defendant WHITNEY KATHLYN HERSHEY did knowingly make a false and fictitious oral and written statement by certifying that she was the transferee of the firearm, when in fact, as defendant WHITNEY KATHLYN HERSHEY there and then well knew, she was not the true transferee of the firearm.

In violation of Title 18, United States Code, Section 924(a)(1)(A).

**COUNT THREE**

1. On or about April 14, 2020, at or near Huntington, Cabell County, West Virginia, and within the Southern District of West Virginia, defendant WHITNEY KATHLYN HERSHEY acquired a Century Arms 7.62 x 39 pistol from Freedom Gun and Pawn, a licensed dealer in firearms.

2. In connection with the acquisition of the aforesaid firearm, defendant WHITNEY KATHLYN HERSHEY did knowingly make a false and fictitious oral and written statement by certifying that she was the transferee of the firearm, when in fact, as defendant WHITNEY KATHLYN HERSHEY there and then well knew, she was not the true transferee of the firearm.

In violation of Title 18, United States Code, Section 924(a)(1)(A).

COUNT FOUR

1. On or about July 1, 2020, at or near Huntington, Cabell County, West Virginia, and within the Southern District of West Virginia, defendant WHITNEY KATHLYN HERSHEY acquired a Taurus Model PT111, G2A 9 mm pistol from Tri-State Pawn and Jewelry of West Virginia, a licensed dealer in firearms.

2. In connection with the acquisition of the aforesaid firearm, defendant WHITNEY KATHLYN HERSHEY did knowingly make a false and fictitious oral and written statement by certifying that she was the transferee of the firearm, when in fact, as defendant WHITNEY KATHLYN HERSHEY there and then well knew, she was not the true transferee of the firearm.

In violation of Title 18, United States Code, Section 924(a)(1)(A).

WILLIAM S. THOMPSON  
United States Attorney

By:



R. GREGORY McVEY  
Assistant United States Attorney